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Counsel for Defendants
Chicago Bridge & Iron Company N.V.,
Philip Asherman, Ron Ballschmiede and
Westley Stockton

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHICAGO BRIDGE & IRON)	CASE NO. 1:17-CV-1580 Hon. Lorna Schofield
COMPANY N.V. SECURITIES)	
LITIGATION)	
)	

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION IN LIMINE NO. 2**

Defendants Chicago Bridge & Iron Co. N.V., Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 2 to preclude any mention of, reference to, or comment about communications between the Plaintiffs or their attorneys and Defendants or their attorneys concerning offers or negotiations of settlement.

Evidence of “furnishing, promising, or offering – or accepting, promising to accept, or offering to accept – a valuable consideration in compromising or attempting to compromise the claim; and conduct or a statement made during compromise negotiations about the claim,” is

inadmissible on behalf of any party “to prove or disprove the validity or amount of a disputed claim or to impeach by a prior inconsistent statement or contradiction.” FED. R. EVID. 408.

Dated: December 13, 2021

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

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